

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

**HAITIAN EVANGELICAL CLERGY
ASSOCIATION; SERVICE EMPLOYEES
INTERNATIONAL UNION – LOCAL
32BJ; SABINA BADIO FLORIAL;
YOUDELAINE DORCIN; ROBERT
JEAN ALIX ERINAC; RACHELLE
GUIRAND; DIEU YOLNICK JEUNE
CADET; AUDOINE AMAZAN; GERALD
MICHAUD; NADEGE JOSEPH
MICHAUD; and MARIE WILDRIGUE
ERINAC MIOT,**

Plaintiffs,

v.

**DONALD J. TRUMP, President of the
United States of America; UNITED
STATES OF AMERICA; THE
DEPARTMENT OF HOMELAND
SECURITY; and KRISTI NOEM,
Secretary of Homeland Security,**

Defendants.

Case No. 1:25-cv-01464-BMC

**NOTICE OF MOTION FOR
PARTIAL SUMMARY JUDGMENT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that on March 25, 2025, at 9:30 a.m., or as soon thereafter as the matter may be heard, at 225 Cadman Plaza East, Brooklyn, New York 11201, Plaintiffs will, pursuant to Federal Rule of Civil Procedure 56, move this Court, the Hon. Brian M. Cogan, U.S.D.J., for summary judgment on their claim that the Secretary of Homeland Security's February 24, 2025, "partial vacatur" of Haiti's Temporary Protected Status designation under 8 U.S.C. § 1254a is "in excess of statutory ... authority" and must therefore be "held unlawful and set aside" under 5 U.S.C. § 706(2). In support their motion, Plaintiffs submit contemporaneously with this notice: (1) their Memorandum of Law dated

March 24, 2025; (2) the Declaration of Marie Wildrigue Erinac Miot dated March 11, 2025; and (3) the Declaration of Youdelaine Dorcin dated March 12, 2025.

Dated: March 24, 2025

Respectfully submitted,

/s/ Andrew Tauber

Andrew Tauber

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*PHV application forthcoming

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